

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

May 3, 2023

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: MAY 04 2023Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committees ("PECs"), together with the Defendants¹ (collectively, "Parties") write regarding the Opinion & Order ("the Order") of Magistrate Judge Netburn, entered on the ECF system at Docket Entry No. 9060 on April 27, 2023. The Parties write jointly to respectfully request that the Court grant the Parties an extension from May 11, 2023, until May 31, 2023, to file any Objections.

The parties are presently assessing the Order to determine what issues, if any, should be raised for the Court's attention through Objections and need the additional time to make those assessments. In addition, members of the PECs are simultaneously preparing the Plaintiffs' *Daubert* motions due to be filed on May 12, 2023.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haeefe
ROBERT T. HAEFELE
MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel.: (843) 216-9184
Email: rhaefe@motleyrice.com

COZEN O'CONNOR

By: /s/ Sean P. Carter
SEAN P. CARTER
COZEN O'CONNOR
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105
Email: scarter@cozen.com

¹ For the purposes of this submission, "Defendants" means World Assembly of Muslim Youth and World Assembly of Muslim Youth International, International Islamic Relief Organization, Muslim World League, the four "Charity Officer Defendants" (Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Mohsen al Turki, and Adnan Basha), and Yassin Kadi.

The Honorable George B. Daniels, U.S.D.J.
May 3, 2023
Page 2

*For the Plaintiffs' Executive Committee for Personal
Injury and Death Claims*

*For the Plaintiffs' Executive Committee for Commercial
Claims*

cc: The Honorable Sarah Netburn, via ECF
All Counsel of Record via ECF

SUBJECT TO FBI PROTECTIVE ORDER